

1 JACOB D. BUNDICK, ESQ.
2 Nevada Bar No. 9772
3 GREENBERG TRAURIG, LLP
3773 Howard Hughes Parkway,
3 Suite 400 North
4 Las Vegas, Nevada 89169
5 Telephone: (702) 792-3773
5 Facsimile: (702) 792-9002
6 Email: bundickj@gtlaw.com

7 *Counsel for Plaintiff*
7 *FocalPoint International, Inc.*

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10 **UNITED STATES DISTRICT COURT**

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12 **DISTRICT OF NEVADA**

13 FOCALPOINT INTERNATIONAL, INC.,
14 Plaintiff,
15 vs.
16 DOM RUBINO CONSULTING SERVICES,
17 INC.; and BIZSTRATPLAN, INC.,
18 Defendants.

19 Case No.: 2:18-cv-00236-APG-PAL

20 **STIPULATION AND ORDER FOR**
EXTENSION OF TIME FOR PLAINTIFF
FOCALPOINT INTERNATIONAL, INC.
TO FILE A RESPONSE TO
DEFENDANTS' MOTION TO DISMISS
[FIRST REQUEST]

21 Plaintiff, FocalPoint International, Inc. ("FocalPoint"), by and through its undersigned
22 counsel of record, and Defendants, Dom Rubino Consulting Services, Inc. and BizStratPlan, Inc.
23 ("Defendants") (collectively, the "Parties"), by and through their undersigned counsel of record,
24 hereby stipulate and agree as follows:

25 1. On February 8, 2018, FocalPoint filed its Complaint for Declaratory Relief against
Defendants [ECF No. 1].

26 2. On March 22, 2018, Defendants filed a Motion to Dismiss [ECF No. 10].

27 3. FocalPoint's deadline to file a response to Defendants' Motion to Dismiss is April 5, 2018.

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1 4. Due to scheduling conflicts of counsel, FocalPoint and Defendants have stipulated to
2 allow FocalPoint additional time to file its response to Defendants' Motion to Dismiss. This is the
3 first request for an extension of time of FocalPoint's April 5, 2018 deadline.

4 The Parties accordingly request an extension for FocalPoint to file its response to
5 Defendants' Motion to Dismiss up to and including **April 12, 2018**.

6 **IT IS SO STIPULATED.**

7 DATED this 3rd day of April, 2018.

7 DATED this 3rd day of April, 2018.

8 GREENBERG TRAURIG, LLP

8 LEWIS ROCA ROTHGERBER CHRISTIE LLP

9 /s/ Jacob D. Bundick, Esq.

9 /s/ Dan R. Waite, Esq.

10 JACOB D. BUNDICK, ESQ.

10 DAN R. WAITE, ESQ.

11 Nevada Bar No. 9772

11 Nevada Bar No. 4078

12 3773 Howard Hughes Parkway, Suite 400 N
12 Las Vegas, NV 89169

12 ERIK J. FOLEY, ESQ.
12 Nevada Bar No. 14195

13 *Counsel for Plaintiff*
13 *FocalPoint International, Inc.*

14 *Counsel for Defendants Dom Rubino Consulting*
14 *Services, Inc. and BizStratPlan, Inc.*

18 **IT IS SO ORDERED** this 3rd day of April, 2018.

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20 UNITED STATES DISTRICT JUDGE /